

From: Debbie McVicker <debbie.mcvicker@n2pub.com>
Sent: Tuesday, February 22, 2022 10:38 AM
To: DES SBCC <sbcc@des.wa.gov>
Subject: lsmith@lakewood-wa.com

External Email

Dear members of the Washington State Building Code Council,

I am bewildered with how difficult Washington State is making small businesses grow and succeed. From the Washington State 2021 Department of Commerce report, 99.5% of businesses in Washington are small businesses with about half of all jobs are for small businesses. Please consider this email.

I am writing to express my opposition to the following proposed code changes for the state energy code:

- [21-GP1-136](#) – Bans the use of natural gas for commercial water heating uses and requires the use of electric heat pumps for water heating purposes.
- [21-GP1-103](#)- Requires electric heat pumps for all new commercial construction and retrofits and bans the use of natural gas for commercial space heating (HVACs).

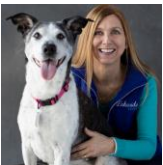
The council has claimed these proposals will improve energy efficiency, but that case has not been made and without a cost benefit proposal, it's unclear as to what the gains will be vs the costs. As a small business, I am best placed to make the choice on which energy solution best suits my and my needs and interests. These policies remove that ability for me to choose.

Natural gas from buildings is responsible for less than 10% of the amount of the state's emissions. Policies like this will not move the needle enough to justify the added costs. The case has not been made that these policies will advance energy efficiency ~ and the TAG Energy group violated the APA to advance these policies without the required cost benefit analysis, which would have explored these costs.

I urge a NO vote on these two proposals. They will do little to advance the state's climate goals.

Thank you,

Debbie



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